

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,
v.

D-1 BRIAN MAURICE BROWN,
D-2 JOHN BRYANT,
D-3 ZION SPEED,
D-4 DOMINIQUE GLENN,
D-5 DEMECKO MOTTON, and
D-6 AKIA BROWN,

Case: 2:24-cr-20667
Assigned To : Hood, Denise Page
Referral Judge: Patti, Anthony P.
Assign. Date : 12/4/2024
Description: IND USA V SEALED MATTER (SS)

Violations:
21 U.S.C. § 846
21 U.S.C. § 841(a)(1)
18 U.S.C. § 1956(h)

Defendants.

Indictment

The Grand Jury charges that:

Count One
Conspiracy to Distribute and Possess with Intent to Distribute a Controlled Substance
21 U.S.C. §§ 846 & 841(a)(1)

D-1 BRIAN MAURICE BROWN
D-2 JOHN BRYANT
D-3 ZION SPEED
D-4 DOMINIQUE GLENN
D-5 DEMECKO MOTTON

From in or around October 2020, through on or about March 31, 2024, in the Eastern District of Michigan, and elsewhere, the defendants, BRIAN MAURICE BROWN, JOHN BRYANT, ZION SPEED, DOMINIQUE GLENN, and DEMECKO MOTTON, knowingly and intentionally combined, conspired,

confederated, and agreed with each other and with persons known and unknown to the Grand Jury, to distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Sections 846 and 841(a)(1).

With respect to the defendant, BRIAN MAURICE BROWN, the controlled substances involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, are 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(A)(ii), 400 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(A)(vi), 1 kilogram or more of a mixture and substance containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(A)(i) and 50 grams or more of methamphetamine, in violation of Title 21, United States Code, Section 841(b)(1)(A)(viii).

With respect to the defendant, JOHN BRYANT, the controlled substances involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, are 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, in

violation of Title 21, United States Code, Section 841(b)(1)(A)(ii), 400 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(A)(vi), and 50 grams or more of methamphetamine, in violation of Title 21, United States Code, Section 841(b)(1)(A)(viii).

With respect to the defendant, ZION SPEED, the controlled substances involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, are 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(A)(ii), and 400 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(A)(vi).

With respect to the defendant, DOMINIQUE GLENN, the controlled substances involved in the conspiracy attributable to her as a result of her own conduct, and the conduct of other conspirators reasonably foreseeable to her, are a mixture and substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(C), and a mixture and substance

containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(C).

With respect to the defendant, DEMECKO MOTTON, the controlled substances involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, are 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(A)(ii), and 400 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(A)(vi).

Count Two
Possession of Cocaine with Intent to Distribute
21 U.S.C. § 841(a)(1)

D-1 BRIAN MAURICE BROWN

On or about September 15, 2023, in the Eastern District of Michigan, the defendant, BRIAN MAURICE BROWN, knowingly and intentionally possessed with intent to distribute a controlled substance, that is, 5 kilograms or more of a mixture and substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(A)(ii), and Title 18, United States Code, Section 2.

Count Three
Possession of Fentanyl with Intent to Distribute
21 U.S.C. § 841(a)(1)

D-1 BRIAN MAURICE BROWN

On or about September 15, 2023, in the Eastern District of Michigan, the defendant, BRIAN MAURICE BROWN, knowingly and intentionally possessed with intent to distribute a controlled substance, that is, 400 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(A)(vi), and Title 18, United States Code, Section 2.

Count Four
Possession of Cocaine with Intent to Distribute
21 U.S.C. § 841(a)(1)

D-3 ZION SPEED

On or about September 15, 2023, in the Eastern District of Michigan, the defendant, ZION SPEED, knowingly and intentionally possessed with intent to distribute a controlled substance, that is, 500 grams or more of a mixture and substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(B)(ii).

Count Five
Possession of Cocaine with Intent to Distribute
21 U.S.C. § 841(a)(1)

D-4 DOMINIQUE GLENN

On or about September 15, 2023, in the Eastern District of Michigan, the defendant, DOMINIQUE GLENN, knowingly and intentionally possessed with intent to distribute a controlled substance, that is, a mixture and substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(C).

Count Six
Possession of Cocaine with Intent to Distribute
21 U.S.C. § 841(a)(1)

D-5 DEMECKO MOTTON

On or about September 15, 2023, in the Eastern District of Michigan, the defendant, DEMECKO MOTTON, knowingly and intentionally possessed with intent to distribute a controlled substance, that is, 500 grams or more of a mixture

and substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(B)(ii).

Count Seven
Possession of Fentanyl with Intent to Distribute
21 U.S.C. § 841(a)(1)

D-5 DEMECKO MOTTON

On or about September 15, 2023, in the Eastern District of Michigan, the defendant, DEMECKO MOTTON, knowingly and intentionally possessed with intent to distribute a controlled substance, that is, 400 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(A)(vi).

Count Eight
Conspiracy to Launder Monetary Instruments
18 U.S.C. § 1956(h)

D-1 BRIAN MAURICE BROWN
D-4 DOMINIQUE GLENN
D-6 AKIA BROWN

From in or around October 2020, through on or about March 31, 2024, in the Eastern District of Michigan, and elsewhere, the defendants, BRIAN MAURICE BROWN, DOMINIQUE GLENN, and AKIA BROWN, knowingly combined, conspired, and agreed with each other and with other persons known and unknown

to the Grand Jury, to commit offenses in violation of Title 18, United States Code, Section 1956, to wit:

(1) to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which transactions involved the proceeds of a specified unlawful activity, that is, possession of a controlled substance with intent to distribute and distribution of a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and conspiracy to commit those offenses, in violation of Title 21, United States Code, Section 846, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and knowing, while conducting and attempting to conduct such financial transactions, that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); and

(2) to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which transactions involved the proceeds of a specified unlawful activity, that is, possession of a controlled substance with intent to distribute and distribution of a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and conspiracy to

commit those offenses, in violation of Title 21, United States Code, Section 846, knowing that the transactions were designed in whole and in part to avoid a transaction reporting requirement under State or Federal law, and knowing, while conducting and attempting to conduct such financial transactions, that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(ii);

All in violation of Title 18, United States Code, Section 1956(h).

PRIOR CONVICTION ALLEGATIONS
21 U.S.C. §§ 841, 851

D-1 BRIAN MAURICE BROWN
D-2 JOHN BRYANT

Pursuant to the enhanced penalties under Title 21, United States Code, Sections 841, 846, and 851, the grand jury alleges the following:

1. As it relates to Counts One, Two, and Three of this Indictment, the defendant, BRIAN MAURICE BROWN, (1) has a prior serious drug felony conviction; (2) served a term of imprisonment of more than 12 months for that conviction; and (3) was released from any term of imprisonment within 15 years of the commencement of the instant offense.
2. As it relates to Count One of this Indictment, the defendant, JOHN

BRYANT, (1) has a prior serious drug felony conviction; (2) served a term of imprisonment of more than 12 months for that conviction; and (3) was released from any term of imprisonment within 15 years of the commencement of the instant offense.

Forfeiture Allegations
21 U.S.C. § 853 and 18 U.S.C. § 982

The allegations contained in Counts One through Eight of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture under Title 21, United States Code, Section 853, and Title 18, United States Code, Section 982(a)(1).

Pursuant to Title 21, United States Code, Section 853(a), any defendant convicted of one or more offenses charged in Counts One through Seven of the Indictment, shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses, violations of Title 21, United States Code, Section 846 and 841, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the offenses.

Pursuant to Title 18, United States Code, Section 982(a)(1), the defendants convicted of the money laundering offense charged in Count Eight of the

Indictment shall forfeit to the United States of America any property, real or personal, involved in such offense, and any property traceable to such property.

As part of the forfeiture in this case and upon conviction of the defendants, the United States intends to seek entry of forfeiture money judgments against the defendants representing the proceeds obtained by each defendant as result of their violations of Counts One through Seven of the Indictment, and the value of the property involved in the violation of Count Eight of the Indictment.

If any of the property described above, as a result of any act or omission of the defendant[s]:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property under Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

This is a True Bill.

/s/ Grand Jury Foreperson
Grand Jury Foreperson

DAWN N. ISON
United States Attorney

/s/ Benjamin Coats
Benjamin Coats
Chief, Drug Task Force Unit

/s/ Caitlin Casey
Caitlin Casey
Assistant United States Attorney

/s/ Rajesh Prasad
Rajesh Prasad
Assistant United States Attorney

Dated: December 4, 2024

United States District Court
Eastern District of Michigan

Criminal Case Cov

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to com

Case: 2:24-cr-20667
Assigned To : Hood, Denise Page
Referral Judge: Patti, Anthony P.
Assign. Date : 12/4/2024
Description: IND USA V SEALED MATTER (SS)

Companion Case Information

Companion Case Number:

This may be a companion case based upon LCrR 57.10 (b)(4)¹:

Judge Assigned:

Yes

No

AUSA's Initials:  CAC

Case Title: USA v. Brian Maurice Brown et al.

County where offense occurred : Wayne, Oakland, and others

Check One: Felony

Misdemeanor

Petty

Indictment/ Information -- no prior complaint.

Indictment/ Information -- based upon prior complaint [Case number:]

Indictment/ Information -- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ **Judge:** _____

- Corrects errors; no additional charges or defendants.
- Involves, for plea purposes, different charges or adds counts.
- Embraces same subject matter but adds the additional defendants or charges below:

Defendant name

Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

December 4, 2024

Date

s/Caitlin Casey

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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.